

IN THE FIFTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

FREDERICK MAY and LODUSKA MAY )  
Plaintiffs, )  
v. ) Docket No.: 13C606  
SAINT THOMAS OUTPATIENT )  
NEUROSURGICAL CENTER, LLC, )  
HOWELL ALLEN CLINIC, A Professional )  
Corporation, and )  
ST. THOMAS HOSPITAL )  
Defendants. )

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DEFENDANT SAINT THOMAS OUTPATIENT NEUROSURGICAL CENTER, LLC'S  
RESPONSE TO PLAINTIFFS FREDERICK AND LODUSKA MAY'S  
FIRST SET OF INTERROGATORIES

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Defendant Saint Thomas Outpatient Neurosurgical Center, LLC ("STOPNC") provides the following responses to Plaintiffs' First Set of Interrogatories:

2. Identify every individual relied upon or consulted when deciding whether to purchase methylprednisolone acetate from NECC for use at Saint Thomas Outpatient Neurosurgical Center. With respect to each individual state their full name, address, telephone number, job title, employer and employer's address.

**ANSWER:**

Ms. Schamberg, in consultation with Dr. Culclasure, decided to begin purchasing MPA from NECC.

Ms. Schamberg relied on representations made by John Notarianni, an NECC sales representative, and promotional materials provided by Mr. Notarianni.

Ms. Schamberg also relied on representations made by individuals at CuraScript, Inc. and/or Clint Pharmaceuticals, Inc., both directly and as communicated to her by Sandy Littleton.

Based upon information and belief, in June 2011, Mr. Notarianni was employed by Medical Sales Management as a Regional Sales Manager. Mr. Notarianni provided a cell phone number of (508) 454-0779. Medical Sales Management's address is 701 Waverly Street, Framingham, MA 01702.

Sandy Littleton is a staff nurse and a Howell Allen employee. She can be contacted through Defendant's counsel.

Clint Pharmaceuticals' telephone number is (615) 882-0042. Clint Pharmaceuticals' address is 629 Shute Lane, Old Hickory, TN 37138. Clint Ebel was the sales representative that Ms. Schamberg dealt with.

CuraScript's telephone number is (614) 539-8074. CuraScript's address is 2297 Southwest Blvd., Grove City, OH 43123. Sandra Nunez and Ruth Bartman were the sales representatives that Ms. Schamberg dealt with.

Apr. 2, 2013 3:57PM

No. 0756 P. 6

VERIFICATION

STATE OF TENNESSEE              )  
COUNTY OF DAVIDSON              )  
                                    )

I, John W. Culclasure, M.D., Medical Director of Saint Thomas Outpatient Neurosurgical Center, LLC swear and affirm that:

1. I am the Medical Director of STOPNC.
2. I have read the said interrogatories, and the foregoing answers thereto are true according to the best of my knowledge, information, and belief.

SAINT THOMAS OUTPATIENT  
NEUROSURGICAL CENTER, LLC

By: John W. Culclasure, M.D.

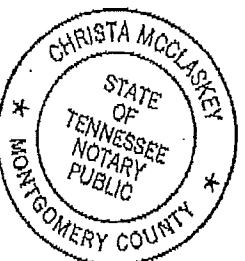
Its: Medical Director

Sworn to and subscribed before me this 2nd day of April, 2013.

Christa McClaskey  
Notary Public

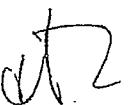
My Commission Expires:

March 14, 2017



Respectfully submitted,

**GIDEON, COOPER & ESSARY, PLC**

By: 

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